

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PALTALK HOLDINGS, INC.,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

CIVIL ACTION NO. 6:21-CV-00757-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Order Governing Proceedings – Patent Case (OGP Version 3.5.1) and as agreed by the parties in the Agreed Scheduling Order (Dkt. 24), Plaintiff Paltalk Holdings, Inc. (“Paltalk”) and Defendant Cisco Systems, Inc. (“Cisco”) hereby submit this claim construction statement for terms included in U.S. Patent No. 6,683,858.

1. Disputed Terms:

A. “a multiplexed stream” / “said multiplexed stream”

Claim Language	Paltalk’s Construction	Cisco’s Construction
“multiplexed stream” (cls. 1, 2, 6, 7)	Plain and ordinary meaning.	“A data structure containing a continuous sequence of interleaved packets of audio data from each client on the active speakers list”

B. “PC-based equipment”

Claim Language	Paltalk’s Construction	Cisco’s Construction
“PC-based equipment” (cls. 4, 9)	“devices for personal computing”	Plain and ordinary meaning.

C. “means for removing” (Claim 7)

Claim Language	Paltalk’s Constructions	Cisco’s Constructions
<p>“means for removing before said packet sender sends said multiplexed stream to one of the plurality of clients which have the capability to mix multiple audio streams, from said multiplexed stream said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers”</p> <p>(cl. 7)</p>	<p>Function: removing, before said packet sender sends said multiplexed stream to one of the plurality of clients which have the capability to mix multiple audio streams, from said multiplexed stream said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers</p> <p>Structure: mixer 118 in Figures 1 and 2 as well as equivalents thereof</p>	<p>Function: removing, before said packet sender sends said multiplexed stream to one of the plurality of clients which have the capability to mix multiple audio streams, from said multiplexed stream said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers</p> <p>Structure: Indefinite</p>

D. “means for removing” (Claim 8)

Claim Language	Paltalk’s Constructions	Cisco’s Constructions
<p>“means for removing, before said packet sender sends said combined packet to one of the plurality of clients which do not have the capability to mix multiple audio streams, from said combined packet said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers”</p> <p>(cl. 8)</p>	<p>Function: removing, before said packet sender sends said combined packet to one of the plurality of clients which do not have the capability to mix multiple audio streams, from said combined packet said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers</p> <p>Structure: mixer 118 in Figures 1 and 2 as well as equivalents thereof</p>	<p>Function: removing, before said packet sender sends said combined packet to one of the plurality of clients which do not have the capability to mix multiple audio streams, from said combined packet said packets of audio data received from said one of the plurality of clients, when said one of the plurality of clients is on said list of active speakers</p> <p>Structure: Indefinite</p>

2. Agreed Constructions:

Terms and Asserted Claims	Parties' Agreed Construction
<p>“means for storing information indicative of whether each of the plurality of clients has the capability to mix multiple audio streams”</p> <p>(Cls. 6-10)</p>	<p>Function: storing information indicative of whether each of the plurality of clients has the capability to mix multiple audio streams</p> <p>Structure: main memory 408 and processor 404 in Figure 4 as well as equivalents thereof</p>
<p>“means for maintaining”</p> <p>(Cls. 6-10)</p>	<p>Function: maintaining a list of each of the plurality of clients that is an active speaker</p> <p>Structure: control logic, like that of control flow 300 in Figure 3, executed by the computer system 400 in Figure 4 as well as equivalents thereof</p>

Dated: February 4, 2022

Respectfully submitted,

By: /s/ Max L. Tribble, Jr.

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was filed electronically using the Court's CM/ECF system, on the 4th day of February 2022.

/s/ Max L. Tribble, Jr.
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